



**Department of
Early Education and Care**
THE COMMONWEALTH OF MASSACHUSETTS

Small Group and School Age Child Care Licensing

**Policy Statement: Background Record Checks for Small Group and School Age Child
Care Programs**

606 CMR 7.03(7) Additional Requirements for Large Group and School Age Child Care Programs.

In addition to the written documents required for licensure specified by 606CMR 7.03(1)c and 7.03(6), the applicant must submit:

(a) Background Record Check policies;

Small Group and School Age programs are programs providing care for ten or fewer children at any given time. This type of programming is a hybrid between Large Group and School Age child care and Family Child Care. Regulations addressing licensing requirements for Small Group and School Age Child Care were promulgated on January 22, 2010. These regulations, specifically 606 CMR 7.03(6), inadvertently excluded Small Group and School Age Child Care programs from the requirement to create and submit a Background Record Check Policy, similar to requirement for Large Group and School Age programs.

The intent of all Department of Early Education and Care (EEC) regulations related to Background Record Checks is that all educators and employees, including employees of small group and school age programs, have a background that does not adversely affect their ability to provide for the safety and well being of a child.

Additionally, 102 CMR 1.05(2)(a) makes clear that the licensee shall determine, in accordance with EEC policy, whether the employee's or potential employee's conduct shall disqualify him/her from employment. The policy referred to in this regulation are the EEC Background Record Check regulations and the EEC Background Record Check Technical Assistance Paper.

For purposes of consistent implementation of EEC licensing regulations, Small Group and School Age programs will be expected to comply with 606 CMR 7.03(7)(a), thereby requiring Small Group and School Age programs to develop, implement and submit Background Record Check policies.